

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

**HO WAN KWOK,  
a/k/a “Miles Guo,”  
a/k/a “Miles Kwok,”  
a/k/a “Guo Wengui,”  
a/k/a “Brother Seven,”  
a/k/a “The Principal,”  
KIN MING JE,  
a/k/a “William Je,” and  
YANPING WANG,  
a/k/a “Yvette,”  
Defendants.,**

Case No. **23 Cr. 118 (AT)**

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that undersigned counsel, Bradford L. Geyer, of the law firm FormerFedsGroup.Com LLC, hereby enters an appearance as counsel **for 3,345 Himalaya Exchange customers in the above-captioned action.**

Dated: New York, New York  
December 6, 2023

Myer and Scher LLP

By: /s/ Jamie Scher  
Myer and Scher LLP  
NY 2488435  
377B South Oyster Bay Road  
Plainview, NY 118013  
Jamie@myerandscher.com  
(516) 713-0655

**Bradford L. Geyer, PHV** pending  
NJ 022751991  
Suite 141 Route 130 S., Suite 303  
Cinnaminson, NJ 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

*Attorneys for 3,345 Himalaya  
Exchange Customers*

## V. CONCLUSION

Based on the foregoing, pursuant to Federal Rule of Criminal Procedure 41(g), petitioners move for return of their property seized by the United States in *United States v. Kwok*, 23 CR 18 SDNY), and as that the Court adopt the aforementioned procedure for the confidential and speedy return of their property.

/s/ Jamie Scher

Jamie Scher  
NY 2488435  
Myer and Scher LLP  
377B South Oyster Bay Road  
Plainview, NY 118013  
Jamie@myerandscher.com  
(516) 713-0655

/s/ Brad Geyer

Bradford L. Geyer, PHV pending  
NJ 022751991  
Suite 141 Route 130 S., Suite 303  
Cinnaminson, NJ 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

## CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2023, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

**HO WAN KWOK,  
a/k/a "Miles Guo,"  
a/k/a "Miles Kwok,"  
a/k/a "Guo Wengui,"  
a/k/a "Brother Seven,"  
a/k/a "The Principal,"  
KIN MING JE,  
a/k/a "William Je," and  
YANPING WANG,  
a/k/a "Yvette,"  
Defendants.,**

Case No. **23 Cr. 118 (AT)**

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that undersigned counsel, Bradford L. Geyer, of the law firm FormerFedsGroup.Com LLC, hereby enters an appearance as counsel **for 3,345 Himalaya Exchange customers in the above-captioned action.**

Dated: New York, New York  
December 6, 2023

Myer and Scher LLP

By: /s/ Jamie Scher  
Myer and Scher LLP  
NY 2488435  
377B South Oyster Bay Road  
Plainview, NY 118013  
Jamie@myerandscher.com  
(516) 713-0655

**Bradford L. Geyer, PHV** pending  
NJ 022751991  
Suite 141 Route 130 S., Suite 303  
Cinnaminson, NJ 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

*Attorneys for 3,345 Himalaya  
Exchange Customers*

## V. CONCLUSION

Based on the foregoing, pursuant to Federal Rule of Criminal Procedure 41(g), petitioners move for return of their property seized by the United States in *United States v. Kwok*, 23 CR 18 SDNY), and as that the Court adopt the aforementioned procedure for the confidential and speedy return of their property.

/s/ Jamie Scher

Jamie Scher  
NY 2488435  
Myer and Scher LLP  
377B South Oyster Bay Road  
Plainview, NY 118013  
Jamie@myerandscher.com  
(516) 713-0655

/s/ Brad Geyer

Bradford L. Geyer, PHV pending  
NJ 022751991  
Suite 141 Route 130 S., Suite 303  
Cinnaminson, NJ 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

## CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2023, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the

## 六、结论

基于上述原因和我们在先前文件中提出并援引的理由, 我们恳请法院下令退还被美国政府扣押的每位 HDO 成员在 HEX 中的资金。正义要求迅速果断地采取行动, 制止持续发生的伤害, 并确保无辜受害者的权利得到充分保护。任何不足之处都将延续已经加诸这些个人的深重不公。

日期: 2025 年 4 月 7 日

谨此提交

/s/ 布拉德·盖耶  
布拉德·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 套房  
新泽西州辛纳明逊 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

### 送达证明

本人特此证明, 于 2025 年 4 月 7 日, 以下文件的真实准确副本已通过美国纽约南区地方法院的电子文档系统电子提交并送达。

/s/ 布拉德·盖耶  
布拉德·L·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 号  
新泽西州锡南明森 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

## 六、结论

基于上述原因和我们在先前文件中提出并援引的理由, 我们恳请法院下令退还被美国政府扣押的每位 HDO 成员在 HEX 中的资金。正义要求迅速果断地采取行动, 制止持续发生的伤害, 并确保无辜受害者的权利得到充分保护。任何不足之处都将延续已经加诸这些个人的深重不公。

日期: 2025 年 4 月 7 日

谨此提交

/s/ 布拉德·盖耶  
布拉德·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 套房  
新泽西州辛纳明逊 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

### 送达证明

本人特此证明, 于 2025 年 4 月 7 日, 以下文件的真实准确副本已通过美国纽约南区地方法院的电子文档系统电子提交并送达。

/s/ 布拉德·盖耶  
布拉德·L·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 号  
新泽西州锡南明森 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

## 六、结论

基于上述原因和我们在先前文件中提出并援引的理由, 我们恳请法院下令退还被美国政府扣押的每位 HDO 成员在 HEX 中的资金。正义要求迅速果断地采取行动, 制止持续发生的伤害, 并确保无辜受害者的权利得到充分保护。任何不足之处都将延续已经加诸这些个人的深重不公。

日期: 2025 年 4 月 7 日

谨此提交

/s/ 布拉德·盖耶  
布拉德·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 套房  
新泽西州辛纳明逊 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708

### 送达证明

本人特此证明, 于 2025 年 4 月 7 日, 以下文件的真实准确副本已通过美国纽约南区地方法院的电子文档系统电子提交并送达。

/s/ 布拉德·盖耶  
布拉德·L·盖耶, PHV  
NJ 022751991  
141 130 号南路 303 号  
新泽西州锡南明森 08077  
Brad@FormerFedsGroup.Com  
(856) 607-5708